

FRIENDSHIP BROADCASTING, LLC

ANTHONY V. BONO

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Federal Communications Commission
Media Bureau
Washington, DC

MB Docket No. 05-210
RM - 10960

Gentleman,

I am the owner and president of Friendship Broadcasting, WLLJ Etowah, TN and also a consulting engineer mainly regarding the FM Spectrum. I have been in the radio business professionally since 1971 and have just about filled every position there is at one time or another at various radio stations, including my own. My expertise at this moment is FM Spectrum, upgrades, changes, etc.

I fully support the streamlining of the FM rules allowing changes of city-of-license by 301 form. In many situations this would save time for processing and would also reduce the backlog and workload of the Allocations Department. I especially like the "first come, first serve" idea, not allowing comments on these proposals, as long as the proposed changes meet the FCC's requirements and as long as the proposed cities meet the indicia requirements, etc. As always, all should be in the public interest. One suggestion based on my experience: I suggest that the number of contingent changes allowed for a 301 Application be raised from 4 to 5. The reason is that the FM spectrum has become extremely crowded and in some areas the addition of one more allowable contingent change would allow more Rulemakings to be avoided by using the 301 process. I think that the present limit of four is rather limiting for a 301. The addition of one more change, raising the limit for 301 changes to 5, would reduce the Allocation Department's workload by a surprising number. Furthermore, as the spectrum becomes more and more crowded it will become even more difficult to make even small changes in some areas with just a limit of just four.

I do not support a new limit for FM changes by Rulemaking to just 5 stations. Again, the Spectrum is so crowded now that it is difficult to make any changes to one facility without including 5 or 6 changes to other FMs. The limit of 5 changes in the Rulemaking process would unfairly end many possibilities of upgrades and new FMs that would be in the public interest. We would, in essence, be moving in reverse as far as making changes possible in the FM band that is extremely crowded. The work involved in formulating Rulemakings with complicated spectrum changes is placed in the hands of broadcasters and engineers. The Allocations Department's responsibility is to review the proposals to see if they meet the FCC's requirement of equal and fair distribution of the Spectrum. The main portion of the work is already done. The FCC checks the proposal to see if the proposal is accurate and in the public interest. Also included in the Rulemaking process are the comments of others. It would be a travesty to place a limit of 5 changes for Rulemakings when it is already difficult enough to make any changes at all with no limit. If the Commission feels that it is absolutely necessary to have "some kind" of limit then please make the limit a much higher number (20-25 for example). There really should be no limit at all if a plan is in the public's best interest and meets all of the FCC's criteria. Otherwise many potential FM changes and opportunities for new FMs and First Local Services, in the public's best interest, would be squelched. This would be unfortunate for many communities without a "voice" and rather limiting for all broadcasters, big, medium and small.

In addition, in my opinion, I suggest that in a Rulemaking or with 301 Applications, FMs that merely change cities of license without changing facilities in anyway should not be counted in a contingent situation as a station to be changed. For example, if with 301 Applications there are 5 FMs with technical changes and one with a city of license change with exact same facilities, the total number of stations changes would be 5. Backfills with no technical changes should not be counted toward the limit of stations involved. If there are no technical changes on the 301, just a city change, it would not add to the number of stations in the mix of changes.

My comments are based on what I feel is best for the public and broadcasters. Thank you very much for the opportunity to comment in this proceeding.

I hereby verify that the foregoing is true and correct to the best of my knowledge, information, and belief.

Anthony V. Bono
President, Friendship Broadcasting, LLC

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